

SUPERIOR COURT OF N.J.  
REC'D

JAN 13 2003

DONALD F. PHELAN  
CLERK

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ471-02-1(7)

Superior Court

Docket Number

03 - 01 - 00013-S

STATE OF NEW JERSEY )

v. )

MATILDA VELEZ )

SONIA SOTO )

HECTOR BONILLA )

and )

VICKY BONILLA )

INDICTMENT

The Grand Jurors of and for the State of New Jersey, upon  
their oaths, present that:

COUNT ONE

(Conspiracy - Third Degree)

MATILDA VELEZ

SONIA SOTO

HECTOR BONILLA

and

VICKY BONILLA

who are named as defendants herein, and Iris Salkauski, who is a  
conspirator but who is not named as a defendant herein, and  
others whose identities are known and unknown to the Grand  
Jurors, between on or about January 26, 1997, and on or about  
May 14, 1999, at the City of Camden, at the Townships of

Pennsauken and Cherry Hill, all in the County of Camden, at the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the crime of theft by deception, did agree that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crime or an attempt or solicitation to commit such crime; or
- B. One or more of them would aid in the planning, attempt, solicitation or commission of said crime, that is:
  - 1. Purposely obtain the property of another in excess of \$500 by deception, in violation of N.J.S.A. 2C:20-4.

The Grand Jurors aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following Overt Acts, among others, were committed:

OVERT ACTS

- 1. On or about January 26, 1997, at the City of Camden, in the County of Camden, the said MATILDA VELEZ was the driver of a vehicle involved in a staged collision.
- 2. On or about January 26, 1997, at the City of Camden, in the County of Camden, the said SONIA SOTO was an occupant in a vehicle involved in a staged collision.
- 3. On or about January 26, 1997, at the City of Camden, in the County of Camden, the said HECTOR BONILLA was an occupant in a vehicle involved in a staged collision.

4. On or about January 26, 1997, at the City of Camden, in the County of Camden, the said VICKY BONILLA was an occupant in a vehicle involved in a staged collision.

All contrary to the provisions of N.J.S.A 2C:5-2, and against the peace of this State, the government and the dignity of same.

COUNT TWO

(Theft by Deception - Third Degree)

MATILDA VELEZ

SONIA SOTO

HECTOR BONILLA

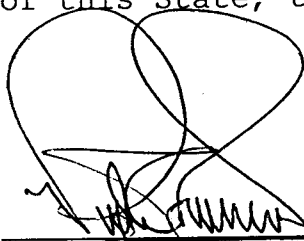
and

VICKY BONILLA

between on or about January 26, 1997, and on or about May 14, 1999, at the City of Camden, at the Townships of Pennsauken and Cherry Hill, all in the County of Camden, at the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain or attempt to obtain property of another, in excess of \$500, by deception, that is, the said MATILDA VELEZ, SONIA SOTO, HECTOR BONILLA and VICKY BONILLA did purposely obtain or attempt to obtain the property of Allstate Insurance Company in excess of \$500 by creating or reinforcing the false impression that an automobile collision that occurred in the City of Camden on January 26, 1997 was accidental; and that Personal Injury Protection (PIP) insurance claims and insurance claims for non-economic losses were compensable pursuant to automobile insurance policies in connection with the planned and staged automobile collision;

WHEREAS, IN TRUTH AND IN FACT, as the said MATILDA VELEZ, SONIA SOTO, HECTOR BONILLA and VICKY BONILLA well knew, the automobile collision which occurred in the City of Camden on

January 26, 1997 was not accidental, but was planned and staged, and the Personal Injury Protection (PIP) insurance claims and insurance claims for non-economic losses submitted to Allstate Insurance Company were not compensable in connection with the planned and staged automobile collision, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Peter C. Harvey, F.A.A.G  
Director  
Division of Criminal Justice

A TRUE BILL:

Kimberly M. DeMaio  
, Foreperson

Dated: 1/13/03